

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Alex Spiro (*appearing pro hac vice*)

2 alexspiro@quinnemanuel.com

Kyle Batter (Bar No. 301803)

3 kylebatter@quinnemanuel.com

4 555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California 94065

5 Telephone: (650) 801-5000

6 Michael T. Lifrak (Bar No. 210846)

michaellifrak@quinnemanuel.com

7 Jeanine Zalduendo (Bar No. 243374)

8 jeaninezalduendo@quinnemanuel.com

865 South Figueroa Street, 10th Floor

9 Los Angeles, California 90017-2543

10 Telephone: (213) 443-3000

11 *Attorneys for Defendants Tesla, Inc., Elon Musk,*

Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,

12 *Antonio J. Gracias, James Murdoch, Kimbal Musk,*

And Linda Johnson Rice

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16
17
18 IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

19 **[PROPOSED] ORDER GRANTING**
20 **DEFENDANTS' ADMINISTRATIVE**
21 **MOTION TO SEAL AMENDED**
22 **EXHIBIT 182**
23
24
25
26
27
28

1 THE COURT, having considered Defendants Tesla, Inc., Elon Musk, Brad W. Buss,
2 Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda
3 Johnson Rice (together, “Defendants”) Administrative Motion to File Under Seal Amended
4 Exhibit 182, and testimony used in support thereof, the Declaration of Nathaniel Smith, and all
5 other filings in this case, has found:

6 (1) There exist compelling reasons to seal Amended Exhibit 182 that overcome the right
7 of public access to the information it contains;

8 (2) A substantial probability exists that the overriding interest will be prejudiced if
9 Amended Exhibit 182 is not sealed;

10 (3) The proposed sealing is narrowly tailored; and

11 (4) No less restrictive means exist to achieve the overriding interest (CRC 2.550(d));

12 **HEREBY ORDERS THAT:**

13 Because Amended Exhibit 182 contains material that is sealable pursuant to Northern
14 District of California Civil Local Rule 79-5, Defendants’ Administrative Motion to Seal Amended
15 Exhibit 182 is hereby **GRANTED**.

16 **IT IS SO ORDERED.**

17 DATED: , 2022
18
19

20 By _____
Honorable Edward M. Chen
21
22
23
24
25
26
27
28